

To: Ryerson.Teddy[Ryerson.Teddy@epa.gov]; Johnson, Kathleen[Johnson.Kathleen@epa.gov]
Cc: Miller, Amy[Miller.Amy@epa.gov]
From: Jones, Joel E.
Sent: Wed 10/30/2013 6:08:29 PM
Subject: RE: Briefing paper on Exide facility and air issues for Oct 8 public meeting

Please see CWA compliance summary below re [REDACTED] and [REDACTED]

We reviewed Los Angeles County Sanitation Districts' Semi-Annual Compliance Report for January 1st – June 30, 2013 to assess the compliance status of the three facilities mentioned in the attachments to the email below:

- Allenco Energy (oil extraction) does not appear to be an industrial user discharging to a POTW. They do not appear in the compliance report as a categorical or non-categorical discharger.
- RDX Technologies (formerly Ridgeline Energy Services) (centralized wastewater treatment) is reported to be in SNC status for failure to provide reports for compliance schedules, self-monitoring data, or categorical standards within the 45 days of the due date. They also exceeded the daily maximum for lead on January 10, 2013.
- Exide Technologies (spent lead-acid recycler) was in compliance during this reporting period.

According to South Coast AQMD's 10/18/13 press release regarding their Order for Abatement against RDX, they required them to not accept any additional wastewater, to promptly treat and dispose of existing wastewater to the sewer, and permanently remove old leaky tanks. The order resulted after a large hydrogen sulfide gas leak from holes in the roofs of old tanks resulted in over 600 community complaints of foul odors. The press release indicates that SCAQMD is reviewing permit applications for a new wastewater treatment that does not use the old tanks, but states that no permits have been issued. However, a 10/17/13 RDX press release states that they were granted a wastewater discharge permit for their new multi-tier water treatment system at the air quality hearing conducted on 10/16/13.

Jim Polek spoke with David Snyder at Los Angeles County Sanitation District and he indicated the RDX is trying to get their wastewater treatment online. They were issued

a temporary permit to treat wastewater and it will take them a few months to treat all wastewater on site. They then need to deal with sludge disposal and tank removal. The facility is an old oil refinery and the tanks on site are from those operations. David Snyder confirmed that Exide has been in compliance with their wastewater disposal. He indicated that Allenco Energy did not discharge to the county sewer and they may discharge to the LA City sewer.

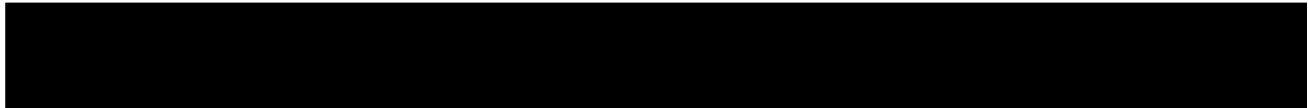
Jim also spoke with Sonny Berberabe at the City of Los Angeles Bureau of Sanitation and he could not find a permit for Allenco Energy. He did find a 2011 inspection report that indicated that the facility does not discharge to the sewer so they were not issued a permit. The report indicated that seven out of 19 wells were in operation. He is going to check with other staff and call me next week if he finds any additional information.

I also checked RCRAInfo and DTSC's manifest database to see if any of these facilities are hazardous waste generators (I knew Exide was) and here is what I found:

- Allenco is a generator of California-only hazardous waste (CAL 000 365 174) and they manifested off 800 pounds of oily debris and PPE (CA 352 organic solids) on 2/10/12. They are not in our system so I do not know if they have been inspected.
- RDX Technologies is not in RCRAInfo and the Santa Fe Springs facility is not in DTSC's manifest database. Interesting, they cannot ship off oily sludge without an EPA ID number.
- Exide Technologies is in SNC status in RCRAInfo. They are under an order from DTSC, who is working closely with air district, to determine if facility should be allowed to operate. According to DTSC's web site, Exide had an appearance in LA Superior Court on October 22, 2013 for the judge to determine if he should lift his ruling that reopened the facility in June 2013, which overruled DTSC's order closing the facility in April 2013.

From: Ryerson.Teddy
Sent: Wednesday, October 30, 2013 10:14 AM
To: Johnson, Kathleen
Cc: Jones, Joel E.; Miller, Amy
Subject: RE: Briefing paper on Exide facility and air issues for Oct 8 public meeting

Thanks much. Also wanted you to see this note, from Nahal yesterday:



From: Johnson, Kathleen
Sent: Wednesday, October 30, 2013 9:55 AM
To: Ryerson.Teddy
Cc: Jones, Joel E.; Miller, Amy
Subject: FW: Briefing paper on Exide facility and air issues for Oct 8 public meeting

Teddy,

Joel is pulling together info on Santa Fe Springs and Exide. Attached is an air paper which describes the sitch at Exide with respect to air issues, which of course is now updated by South Coast's issuance of an order.

Kathleen H. Johnson
Director, Enforcement Division
U.S. EPA - Region 9
75 Hawthorne Street ENF-1
San Francisco, CA 94015
415/972-3873
johnson.kathleen@epa.gov

From: Jones, Joel E.
Sent: Friday, October 25, 2013 9:55 AM
To: Adams, Elizabeth
Cc: Johnson, Kathleen
Subject: RE: Briefing paper on Exide facility and air issues for Oct 8 public meeting

Hi Elizabeth,

Thank you again for the background summary materials for the Oct8 public meeting re Exide facility. Per Teddy's message re Exide (among other facilities of concern to Senator Boxer), I think this summary would be useful to share w/Jared if you haven't already. I understand you're also proposing to approve South Coast's Pb attainment plan in a few weeks. Please let me know what you'd suggest. Thanks.

- Joel

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